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12
13 IN THE UNITED STATES DISTRICT COURT FOR THE
14 EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,) 1:02-cr-5438-OWW
16 v.)
17 AKOP KRBOYAN,) STIPULATION AND **ORDER** re:
18 Plaintiff,) AGREEMENT TO MOVE JURY TRIAL
19) DATE
20) TIME: 9:00 a.m.
21) Honorable Oliver W. Wanger
22 Defendant.)
23 _____)

24 The United States of America, by and through Assistant United
25 States Attorneys Mark E. Cullers and Jeremy R. Jehangiri, and
26 Defendant Akop Krboyan, by and through his counsel Anthony P.
27 Capozzi, submit this stipulation for the Court's consideration.

28 IT IS STIPULATED AND AGREED:

1. The parties request that the jury trial date in this case be
2 continued from August 17, 2011, to September 7, 2011, at 9:00 a.m.

2. The parties stipulate that the time between August 17, 2011,
3 and, through and excluding, September 7, 2011, should be excluded from
4 the calculation of time under the Speedy Trial Act.

5. Due to an unforeseen medical emergency involving counsel, the

1 parties stipulate and agree to this continuance. The parties stipulate
2 that the ends of justice are served by the Court excluding such time,
3 so that counsel for the defendant may have reasonable time necessary for
4 effective preparation, taking into account the exercise of due
5 diligence. 18 U.S.C. § 3161(h)(8)(B)(iv).

6 4. The parties stipulate and agree that the interests of justice
7 served by granting this continuance outweigh the best interests of the
8 public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

9 SO STIPULATED AND AGREED.

10 Dated: August 9, 2011

/s/ Mark E. Cullers

Mark E. Cullers

Assistant United States Attorney

13 /s/ Jeremy Jehangiri

Jeremy R. Jehangiri

Assistant United States Attorney

15 Dated: August 9, 2011

/s/ Anthony P. Capozzi (as authorized)

Anthony P. Capozzi

Attorney for Defendant, Akop Krboyan

19 **ORDER**

20 IT IS SO ORDERED.

21 IT IS SO ORDERED.

22 Dated: August 9, 2011

/s/ Oliver W. Wanger
UNITED STATES DISTRICT JUDGE